

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN M. FRIEDBERG,

Plaintiff,

v.

MUTUAL HOLDINGS LTD, et al.,

Defendants.

CIVIL ACTION

No. 02-CV-3193
(Judge Yohn)

ORDER

AND NOW, this _____ day of August, 2005, upon consideration of the Uncontested Motion for the Admission *Pro Hac Vice* of Patrick J. Rega and Wendy E.D. Smith, it is hereby ORDERED that said motion is GRANTED. Patrick J. Rega and Wendy E.D. Smith are hereby admitted *pro hac vice* to actively participate in the conduct of any trial, pre-trial or post-trial proceeding before this Court in the above-captioned matter.

William H. Yohn, Jr., J.

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN M. FRIEDBERG,

Plaintiff,

v.

MUTUAL HOLDINGS LTD, et al.,

Defendants.

CIVIL ACTION

No. 02-CV-3193
(Judge Yohn)

UNCONTESTED MOTION FOR THE
ADMISSION *PRO HAC VICE* OF
PATRICK J. REGA AND
WENDY E.D. SMITH

I, Han Nguyen, a member in good standing of the bar of this Court and attorney of record for plaintiff Stephen M. Friedberg hereby respectfully move for the admission *pro hac vice* of Patrick J. Rega and Wendy E.D. Smith, and in support thereof, aver the following:

1. Patrick J. Rega and Wendy E.D. Smith are with the firm of Hergenroeder, Rega and Sommer, LLC, Centre City Tower, 650 Smithfield Street, Suite 1700, Pittsburgh, PA 15222, and both are members in good standing of the Bar of the Commonwealth of Pennsylvania. Ms. Smith is also a member in good standing of the Bar of the District of Columbia and an affiliate member in good standing of the Bar of the State of Idaho.

2. Mr. Rega is admitted to practice before the United States District Court for the Western District of Pennsylvania, and the United States Court of Appeals for the Third Circuit.

3. Ms. Smith is admitted to practice before the United States District Courts for the Western District of Pennsylvania, the United States District Court for the District of Columbia, the United States District Court for the District of Idaho, the United States Court of Appeals for the Third Circuit, and the United States Court of Appeals for the Ninth Circuit.

4. Mr. Rega and Ms. Smith have never been disbarred and no action is pending against either of them.

5. Mr. Rega and Ms. Smith are familiar with the facts of this litigation and serve as plaintiff's general counsel. Plaintiff has selected them to be his co-counsel in this litigation.

6. Mr. Rega and Ms. Smith understand that they will be subject to the disciplinary rules of this Court if this motion is granted.

7. In accordance with Local Rule 83.5.2, Mr. Rega and Ms. Smith shall have David Smith and Han Nguyen, members in good standing of the bar of this Court, as co-counsel.

8. Submitted with this motion is a check in the amount of \$80.00, made payable to the Clerk of the Court, to pay the fees required for the admission of Mr. Rega and Ms. Smith.

9. This motion is uncontested.

WHEREFORE, plaintiff Stephen M. Friedberg, by and through his undersigned attorneys, respectfully requests that this Court grant the uncontested motion to admit *pro hac vice* Patrick J. Rega and Wendy E.D. Smith.

Respectfully submitted,

/s/ Han Nguyen

David Smith (I.D. No. 21480)

Han Nguyen (I.D. No. 85860)

Schnader Harrison Segal & Lewis LLP

1600 Market Street, Suite 3600

Philadelphia, Pennsylvania 19103

(215) 751-2000

Attorneys for Plaintiff,
Stephen M. Friedberg

Dated: August 1, 2005.

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN M. FRIEDBERG,

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v.

MUTUAL HOLDINGS LTD, et al.,

Defendants.

CIVIL ACTION

No. 02-CV-3193
(Judge Yohn)

AFFIDAVIT OF PATRICK J. REGA IN
SUPPORT OF UNCONTESTED
MOTION FOR ADMISSION *PRO HAC*
VICE

I, Patrick J. Rega, being duly sworn, depose and say:

1. I am with the law firm of Hergenroeder, Rega and Sommer, LLC, Centre City Tower, 650 Smithfield Street, Suite 1700, Pittsburgh, PA 15222, counsel for plaintiff Stephen M. Friedberg in the above-captioned action.

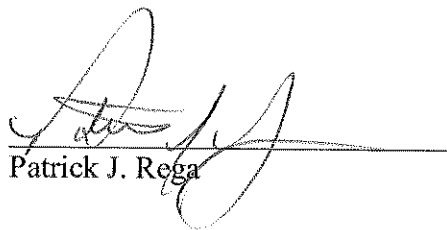
2. I am a member of the Bar in good standing in the Commonwealth of Pennsylvania and admitted to practice before the United States District Court for the Western District of Pennsylvania, and the United States Court of Appeals for the Third Circuit.

3. There are no disciplinary proceedings pending against me as a member of the Bar in any of these jurisdictions, or any jurisdiction whatsoever.

4. I serve as the general counsel for plaintiff Stephen M. Friedberg and have been retained to represent his interests in this action.

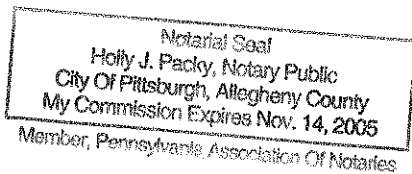
5. The Philadelphia law firm of Schnader Harrison Segal & Lewis LLP, 1600 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103, will serve as co-counsel with respect to this case.

I declare under penalty of perjury that the foregoing is true and correct.


Patrick J. Rega

Sworn and subscribed before me
this 29th day of July, 2005.


Notary Public



UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN M. FRIEDBERG,

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v.

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Defendants.

CIVIL ACTION

No. 02-CV-3193
(Judge Yohn)

AFFIDAVIT OF WENDY E.D. SMITH
IN SUPPORT OF UNCONTESTED
MOTION FOR ADMISSION *PRO HAC*
VICE

I, Wendy E.D. Smith, being duly sworn, depose and say:

1. I am with the law firm of Hergenroeder, Rega and Sommer, LLC, Centre City Tower, 650 Smithfield Street, Suite 1700, Pittsburgh, PA 15222, counsel for plaintiff Stephen M. Friedberg in the above-captioned action.

2. I am a member of the Bar in good standing in the Commonwealth of Pennsylvania and also a member in good standing of the Bar of the District of Columbia and an affiliate member in good standing of the Bar of the State of Idaho. I am admitted to practice before the United States District Court for the Western District of Pennsylvania, the United States District Court for the District of Columbia, the United

States District Court for the District of Idaho, the United States Court of Appeals for the Third Circuit, and the United States Court of Appeals for the Ninth Circuit.

3. There are no disciplinary proceedings pending against me as a member of the Bar in any of these jurisdictions, or any jurisdiction whatsoever.

4. I, along with Patrick J. Rega, serve as the general counsel for plaintiff Stephen M. Friedberg and have been retained to represent his interests in this action.

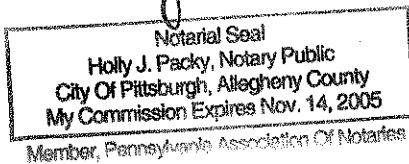
5. The Philadelphia law firm of Schnader Harrison Segal & Lewis LLP, 1600 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103, will serve as co-counsel with respect to this case.

I declare under penalty of perjury that the foregoing is true and correct.


Wendy E.D. Smith

Sworn and subscribed before me
this 29th day of July, 2005.


Notary Public



CERTIFICATE OF SERVICE

I certify that on August 1, 2005, I caused a true and correct copy of the foregoing Uncontested Motion for the Admission *Pro Hac Vice* of Patrick Rega and Wendy Smith to be served via first class mail and electronic mail through the Court's ECF filing system upon the following. This document is available for downloading and review on the Court's ECF filing system.

Brooke J. Hertzner, Esquire
Ballard Spahr Andrews & Ingersoll LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103
HertznerB@ballardspahr.com

/s/ Han Nguyen
Han Nguyen